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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

In the Matter of  
  
End User Common Line  
Charges

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CC Docket No. 95-72

COMMENTS OF THE  
NATIONAL TELEPHONE COOPERATIVE ASSOCIATION

The National Telephone Cooperative Association ("NTCA") submits these Comments in response to the Notice of Proposed Rulemaking, FCC 95-212, released by the Commission on May 30, 1995, in the above-captioned docket ("NPRM"). The NPRM seeks comments on the application of End User Common Line Charges or Subscriber Line Charges (SLCs) to local loops used with Integrated Services Digital Network (ISDN) and other services that permit the provision of multiple voice-grade -equivalent channels to a customer over a single facility.

NTCA is an association representing approximately 500 small and rural independent local exchanges carriers ("LECs") providing telecommunications services to interexchange carriers and subscribers throughout rural America.

The Commission identifies three concerns it must take into account in applying SLCs to ISDN services : competitive developments in the interstate access market, the need to ensure fair competitive ground rules and the need to preserve universal service in a changing environment. NPRM at ¶ 15. NTCA agrees that these concerns should be factored into a resolution of the proper number of SLCs to apply to ISDN. It also believes the

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Commission should adopt a resolution which facilitates and encourages the deployment of ISDN while at the same time reflecting reasonable cost causation principles.

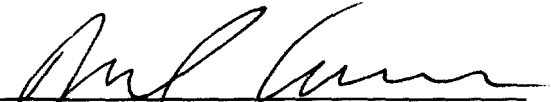
In NTCA's view, the per-facility approach which would have customers pay a single SLC per derived channel service connection most accurately reflects these principles while taking into account the factors the Commission identifies. That option bases the number of SLCs charged to the customer on the physical loop facilities used by the customer and reflects the loop costs used by the customer more accurately than options which apportion the SLC on the basis of derived channels. Alternatively, the proposal to charge one SLC for a two wire BRI connection and two SLCs for a four wire PRI appears also consistent with these principles. In addition, as the Commission observes, that option is consistent with the national interest in facilitating ubiquitous access to the National Information Infrastructure.

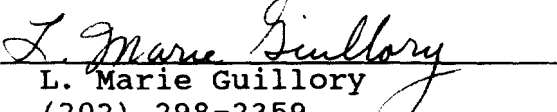
CONCLUSION

For the above stated reasons, NTCA recommends that the Commission adopt the per-facility approach.

Respectfully submitted,

NATIONAL TELEPHONE COOPERATIVE  
ASSOCIATION

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June 29, 1995

CERTIFICATE OF SERVICE

I, Gail C. Malloy, certify that a copy of the foregoing Comments of the National Telephone Cooperative Association in CC Docket No. 95-72 was served on this 29th day of June 1995, by first-class, U.S. Mail, postage prepaid, to the following persons on the attached list.

  
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